From: Torres, Francine

Sent: Monday, August 01, 2005 1:05 PM

To: Benham, Katherine

Subject: FW: Biodiversity Amendment

Attachments: ATTACHMENT.TXT

From: jeffcr@iscweb.com%inter2 [mailto:jeffcr@iscweb.com]

Sent: Monday, August 01, 2005 1:03 PM

To: Torres, Francine

Cc: wendy@marinorganic.org%inter2 **Subject:** Biodiversity Amendment

Jim Riddle, Chair of NOSB c/o Ms. Francine Torres USDA-AMS-TMD-NOP 1400 Independence Ave., SW Room 4008-S, Mail Stop 0268 Washington, DC 20250-0200

Dear Chairman Riddle;

The purpose of this letter is to request the National Organic Standards Board to approve the biodiversity amendments to NOSB's model Organic System Plan (OSP).

As you know, the requirement for biodiversity conservation is already contained within the National Organic Program rule, but has not yet been implemented. Approval and use of the biodiversity criteria will provide consistent guidance to farmers, inspectors, certifiers and accreditation auditors. It will establish common guidelines for the conservation of biodiversity and for the maintenance and improvement of natural resources on the farm.

Although not perfect, the biodiversity criteria represent a consensus of a broad based group including organic farmers, certifiers, inspectors, conservationists, members of the NOSB, and the National Center for Appropriate Technology (NCAT).

As an agricultural consultant with over 30 years of experience in organic production, I see the biodiversity additions as reasonable, realistic, and easily applied to most farming situations. These biodiversity criteria can help raise the meaning and value of organic certification to producers already practicing ecologically sensitive farming, and may serve as an educational tool for organic producers who have not yet integrated broader ecological processes into their management strategies.

I urge the Board's support of the biodiversity amendments to the OSP.

Sincerely,

Jeffrey Creque, Ph.D.